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04-20135241

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 31 2016

CERTIFIED MAIL 7015 1730 0001 8044 2791
RETURN RECEIPT REQUESTED

Ms. Tisha Calabrese Benton
Director, Division of Water Resources
Tennessee Department of Environment & Conservation
William R. Snodgrass TN Tower
312 Rosa L. Parks Avenue, 11th Floor
Nashville, Tennessee 37243

Re: Notice of Violation No.: 309-2016-06
National Pollutant Discharge Elimination System Permit No.: TN0021199
Jefferson City Sewage Treatment Plant

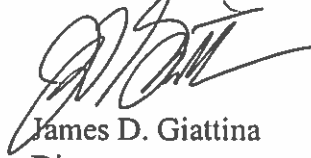
Dear Ms. Benton:

Pursuant to Section 309(a)(1) of the Clean Water Act, 33 U.S.C. § 1319(a)(1), the U. S. Environmental Protection Agency Region 4 has determined that the Jefferson City Public Works and Utilities (Utility) is in violation of its National Pollutant Discharge Elimination System (Permit) Permit No.: TN0021199 for the Jefferson City Sewage Treatment Plant. The Utility has violated, at a minimum, effluent requirements for the parameters listed in the Enclosure summarized here: Dissolved Oxygen, 5-Day Biological Oxygen Demand, pH, Total Suspended Solids, Settleable Solids, E. coli, Total Residual Chlorine and Percent Removal 5-Day Biological Oxygen Demand. The EPA is simultaneously notifying the Utility of these findings through the issuance of a Notice of Violation (NOV). A copy of the NOV to the Utility is enclosed for your convenience and record.

If the State of Tennessee commences appropriate action within 30 days of receipt of this letter to ensure that the Utility achieves expeditious compliance with its Permit, additional involvement by the EPA may not be required. However, if the State does not take such action, the EPA may then take the necessary steps to require the Utility to come into compliance. Please advise the EPA within 15 days of receipt of this letter of the action(s) you plan to take in this matter to ensure that the Utility achieves expeditious compliance with its Permit requirements. If a formal enforcement action is taken, please provide a copy of the applicable documents for our records.

If you have questions regarding this notice, please feel free to contact Mr. Maurice Horsey, Chief of the Municipal and Industrial Enforcement Section, at (404) 562-9764 or by e-mail at horsey.maurice@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Giattina', with a long horizontal flourish extending to the right.

James D. Giattina
Director
Water Protection Division

Enclosure

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Permit Name	Version Nbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
JEFFERSON CITY STP	0	Major	5/30/09	7/1/09	5/31/14

Version # 0

Outfall 001G

00300 Oxygen, dissolved [DO] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	INST MIN
Limit Value	5
DMR Values	
8/31/13	4.86
5/31/14	3.79
8/31/14	3.38

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	COMPOS	Three per Week

Limit				
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	WKLY AVG	WKLY AVG	DAILY MX
Limit Value	250	334	40	45
DMR Values				
2/29/12	290	290	290	290
3/31/12	273	273	273	273
7/31/12	270	270	270	270
7/31/12	433	433	433	433
7/31/12	52	52	52	52
1/31/13	370	370	370	370
1/31/13	544	544	544	544
2/28/13	391	391	391	391
2/28/13	41	41	41	41
2/28/13	56	56	56	56
2/28/13	654	654	654	654
3/31/13	321	321	321	321
3/31/13	372	372	372	372
4/30/13	281	281	281	281
4/30/13	357	357	357	357
6/30/13	314	314	314	314
6/30/13	359	359	359	359
7/31/13	384	384	384	384
7/31/13	42	42	42	42
7/31/13	601	601	601	601
2/28/15	273	273	273	273
2/28/15	383	383	383	383
3/31/15	263	263	263	263
3/31/15	361	361	361	361
4/30/15	281	281	281	281
4/30/15	336	336	336	336
11/30/15	265	265	265	265
12/31/15	385	385	385	385
12/31/15	582	582	582	582

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6	9
DMR Values		
9/30/12	5.09	5.09
10/31/12	5.18	5.18
12/31/12	5.97	5.97
1/31/13	5.41	5.41
2/28/13	5.37	5.37
3/31/13	5.18	5.18
4/30/13	5.32	5.32
7/31/13	5.97	5.97
8/31/13	5.72	5.72
4/30/14	5.88	5.88
12/31/14	10.63	10.63

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	COMPOS	Three per Week

Limit					
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	WKLY AVG	MO AVG	WKLY AVG	DAILY MX
Limit Value	250	334	30	40	45
DMR Values					
2/29/12	48	48	48	48	48
3/31/12	320	320	320	320	320
3/31/12	483	483	483	483	483
7/31/12	46	46	46	46	46
10/31/12	46	46	46	46	46
12/31/12	267	267	267	267	267
12/31/12	47	47	47	47	47
1/31/13	33	33	33	33	33
1/31/13	474	474	474	474	474
1/31/13	636	636	636	636	636
2/28/13	1140	1140	1140	1140	1140
2/28/13	136	136	136	136	136
2/28/13	37	37	37	37	37
2/28/13	557	557	557	557	557
2/28/13	71	71	71	71	71
3/31/13	413	413	413	413	413
3/31/13	482	482	482	482	482
4/30/13	362	362	362	362	362

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values					
4/30/13	421	421	421	421	421
4/30/13	53	53	53	53	53
5/31/13	358	358	358	358	358
5/31/13	41	41	41	41	41
5/31/13	501	501	501	501	501
5/31/13	71	71	71	71	71
6/30/13	350	350	350	350	350
6/30/13	449	449	449	449	449
7/31/13	293	293	293	293	293
7/31/13	382	382	382	382	382
8/31/13	270	270	270	270	270
8/31/13	48	48	48	48	48
12/31/13	262	262	262	262	262
12/31/13	339	339	339	339	339
4/30/14	79	79	79	79	79
10/31/14	337	337	337	337	337
12/31/14	277	277	277	277	277
2/28/15	346	346	346	346	346
2/28/15	49.67	49.67	49.67	49.67	49.67
2/28/15	708	708	708	708	708
2/28/15	99	99	99	99	99
3/31/15	318	318	318	318	318
3/31/15	45.33	45.33	45.33	45.33	45.33
3/31/15	643	643	643	643	643
3/31/15	79	79	79	79	79
4/30/15	33	33	33	33	33
4/30/15	449	449	449	449	449
4/30/15	462	462	462	462	462
4/30/15	57	57	57	57	57
5/31/15	350	350	350	350	350
5/31/15	48	48	48	48	48
5/31/15	480	480	480	480	480
8/31/15	281	281	281	281	281
8/31/15	450	450	450	450	450
8/31/15	50	50	50	50	50
9/30/15	101	101	101	101	101
9/30/15	59	59	59	59	59
9/30/15	622	622	622	622	622
9/30/15	85.33	85.33	85.33	85.33	85.33
9/30/15	979	979	979	979	979
10/31/15	109.67	109.67	109.67	109.67	109.67
10/31/15	1217	1217	1217	1217	1217
10/31/15	147	147	147	147	147
10/31/15	56	56	56	56	56
10/31/15	601	601	601	601	601
11/30/15	49	49	49	49	49
11/30/15	549	549	549	549	549

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values					
11/30/15	60	60	60	60	60
11/30/15	678	678	678	678	678
11/30/15	92	92	92	92	92
12/31/15	53	53	53	53	53
12/31/15	58.67	58.67	58.67	58.67	58.67
12/31/15	703	703	703	703	703
12/31/15	715	715	715	715	715
12/31/15	73	73	73	73	73
1/31/16	297	297	297	297	297
1/31/16	449	449	449	449	449

00545 Solids, settleable / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit	
Limit Unit Desc	Milliliters per Liter
Statistical Base	DAILY MX
Limit Value	1
DMR Values	
3/31/12	1.5
1/31/14	6

31648 E. coli, MTEC-MF / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Three per Week

Limit	
Limit Unit Desc	Number per 100 Milliliters
Statistical Base	DAILY MX
Limit Value	487
DMR Values	
11/30/13	601.5
1/31/14	509.9
12/31/15	870.4

DMR Effluent Violations and Nonreceipt

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1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

50060 Chlorine, total residual / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	INST MAX
Limit Value	.06
DMR Values	
4/30/13	.08
8/31/13	.08
10/31/13	.07
9/30/14	.08
11/30/14	.07

81010 BOD, 5-day, percent removal / Location K / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	CALCTD	Three per Week

Limit		
Limit Unit Desc	Percent	Percent
Statistical Base	DAILY MN	MO AV MN
Limit Value	40	85
DMR Values		
2/28/15	79	79
4/30/15	39	39
5/31/15	81	81
12/31/15	72	72

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

81011 Solids, suspended percent removal / Location K / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	CALCTD	Three per Week

Limit		
Limit Unit Desc	Percent	Percent
Statistical Base	DAILY MN	MO AV MN
Limit Value	40	85
DMR Values		
1/31/13	82	82
2/28/13	80	80
3/31/13	84	84
7/31/13	84	84
1/31/14	83	83
2/28/15	82	82
10/31/15	38	38
10/31/15	72	72
11/30/15	15	15
11/30/15	82	82
12/31/15	69	69

TRP3B IC25 Static Renewal 7 Day Chronic Chrcceriodaphnia / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	COMPOS	Quarterly

Limit	
Limit Unit Desc	Percent
Statistical Base	MINIMUM
Limit Value	33
DMR Values	
10/31/13	3.61



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 31 2016

CERTIFIED MAIL 7015 1730 0001 8044 2784
RETURN RECEIPT REQUESTED

Mr. Porter Massengill
Superintendent of Public Works
Jefferson City Sewage Treatment Plant
Post Office Box 530
Jefferson City, Tennessee 37760

Re: Notice of Violation No.: 309-2016-06
Information Request pursuant to 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit No.: TN0021199
Jefferson City Sewage Treatment Plant

Dear Mr. Massengill:

Pursuant to Section 309(a)(1) of the Clean Water Act, 33 U.S.C. §1319(a)(1), the U.S. Environmental Protection Agency Region 4 hereby notifies the Jefferson City Public Works and Utilities (Utility) that it has violated its National Pollutant Discharge Elimination System Permit No.: TN0021199 (Permit) for the Jefferson City Sewage Treatment Plant. Specifically, the Jefferson City Sewage Treatment Plant has violated effluent requirements for the parameters and months listed in the Enclosure

The EPA requests, pursuant to Section 308 of the CWA, 33 U.S.C. §1318, that the Utility provide a written explanation of the reasons for each of the aforementioned violations, and any other effluent violations that may have occurred from January 31, 2016, to the present, and provide a summary of actions taken or planned by the Utility to correct the problems and to prevent future violations. In instances where the actions are planned, please include a schedule for completing the actions.

The Utility must submit this information within 30 days of receipt of this correspondence. The submittal must be addressed to:

Ms. Alya Singh-White
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

The State of Tennessee is being concurrently notified of these findings. The EPA is coordinating with the State to ensure that timely and appropriate enforcement action is taken and compliance with the conditions of the Permit is achieved.

If these violations are not resolved in a timely or appropriate manner, and/or the Utility fails to respond to the Information Request, the EPA may take enforcement action, which may include issuance of an

administrative order, assessment of administrative penalties, or initiation of a civil judicial action pursuant to Section 309 of the CWA, 33 U.S.C. §1319.

If you have questions regarding this notice and information request, please contact Ms. Alya Singh-White at (404) 562-9339 or by e-mail at singh-white.alya@epa.gov.

Sincerely,

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Ms. Tisha Calabrese Benton
Tennessee Department of Environment and Conservation

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Permit Name	Version Nbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
JEFFERSON CITY STP	0	Major	5/30/09	7/1/09	5/31/14

Version # 0

Outfall 001G

00300 Oxygen, dissolved [DO] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	INST MIN
Limit Value	5
DMR Values	
8/31/13	4.86
5/31/14	3.79
8/31/14	3.38

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	COMPOS	Three per Week

Limit				
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	WKLY AVG	WKLY AVG	DAILY MX
Limit Value	250	334	40	45
DMR Values				
2/29/12	290	290	290	290
3/31/12	273	273	273	273
7/31/12	270	270	270	270
7/31/12	433	433	433	433
7/31/12	52	52	52	52
1/31/13	370	370	370	370
1/31/13	544	544	544	544
2/28/13	391	391	391	391
2/28/13	41	41	41	41
2/28/13	56	56	56	56
2/28/13	654	654	654	654
3/31/13	321	321	321	321
3/31/13	372	372	372	372
4/30/13	281	281	281	281
4/30/13	357	357	357	357
6/30/13	314	314	314	314
6/30/13	359	359	359	359
7/31/13	384	384	384	384
7/31/13	42	42	42	42
7/31/13	601	601	601	601
2/28/15	273	273	273	273
2/28/15	383	383	383	383
3/31/15	263	263	263	263
3/31/15	361	361	361	361
4/30/15	281	281	281	281
4/30/15	336	336	336	336
11/30/15	265	265	265	265
12/31/15	385	385	385	385
12/31/15	582	582	582	582

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6	9
DMR Values		
9/30/12	5.09	5.09
10/31/12	5.18	5.18
12/31/12	5.97	5.97
1/31/13	5.41	5.41
2/28/13	5.37	5.37
3/31/13	5.18	5.18
4/30/13	5.32	5.32
7/31/13	5.97	5.97
8/31/13	5.72	5.72
4/30/14	5.88	5.88
12/31/14	10.63	10.63

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	COMPOS	Three per Week

Limit					
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter	Milligrams per Liter
Statistical Base	MO AVG	WKLY AVG	MO AVG	WKLY AVG	DAILY MX
Limit Value	250	334	30	40	45
DMR Values					
2/29/12	48	48	48	48	48
3/31/12	320	320	320	320	320
3/31/12	483	483	483	483	483
7/31/12	46	46	46	46	46
10/31/12	46	46	46	46	46
12/31/12	267	267	267	267	267
12/31/12	47	47	47	47	47
1/31/13	33	33	33	33	33
1/31/13	474	474	474	474	474
1/31/13	636	636	636	636	636
2/28/13	1140	1140	1140	1140	1140
2/28/13	136	136	136	136	136
2/28/13	37	37	37	37	37
2/28/13	557	557	557	557	557
2/28/13	71	71	71	71	71
3/31/13	413	413	413	413	413
3/31/13	482	482	482	482	482
4/30/13	362	362	362	362	362

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values					
4/30/13	421	421	421	421	421
4/30/13	53	53	53	53	53
5/31/13	358	358	358	358	358
5/31/13	41	41	41	41	41
5/31/13	501	501	501	501	501
5/31/13	71	71	71	71	71
6/30/13	350	350	350	350	350
6/30/13	449	449	449	449	449
7/31/13	293	293	293	293	293
7/31/13	382	382	382	382	382
8/31/13	270	270	270	270	270
8/31/13	48	48	48	48	48
12/31/13	262	262	262	262	262
12/31/13	339	339	339	339	339
4/30/14	79	79	79	79	79
10/31/14	337	337	337	337	337
12/31/14	277	277	277	277	277
2/28/15	346	346	346	346	346
2/28/15	49.67	49.67	49.67	49.67	49.67
2/28/15	708	708	708	708	708
2/28/15	99	99	99	99	99
3/31/15	318	318	318	318	318
3/31/15	45.33	45.33	45.33	45.33	45.33
3/31/15	643	643	643	643	643
3/31/15	79	79	79	79	79
4/30/15	33	33	33	33	33
4/30/15	449	449	449	449	449
4/30/15	462	462	462	462	462
4/30/15	57	57	57	57	57
5/31/15	350	350	350	350	350
5/31/15	48	48	48	48	48
5/31/15	480	480	480	480	480
8/31/15	281	281	281	281	281
8/31/15	450	450	450	450	450
8/31/15	50	50	50	50	50
9/30/15	101	101	101	101	101
9/30/15	59	59	59	59	59
9/30/15	622	622	622	622	622
9/30/15	85.33	85.33	85.33	85.33	85.33
9/30/15	979	979	979	979	979
10/31/15	109.67	109.67	109.67	109.67	109.67
10/31/15	1217	1217	1217	1217	1217
10/31/15	147	147	147	147	147
10/31/15	56	56	56	56	56
10/31/15	601	601	601	601	601
11/30/15	49	49	49	49	49
11/30/15	549	549	549	549	549

DMR Effluent Violations and Nonreceipt

*** Region 4 Certified, Ver. 2.0, 10/14/2010 ***

1/1/2012 12:00:00 AM to 1/31/2016 12:00:00 AM

Permit TN0021199

Version # 0

Outfall 001G

00530 Solids, total suspended / Location 1 / Season 0 / Base

DMR Values					
11/30/15	60	60	60	60	60
11/30/15	678	678	678	678	678
11/30/15	92	92	92	92	92
12/31/15	53	53	53	53	53
12/31/15	58.67	58.67	58.67	58.67	58.67
12/31/15	703	703	703	703	703
12/31/15	715	715	715	715	715
12/31/15	73	73	73	73	73
1/31/16	297	297	297	297	297
1/31/16	449	449	449	449	449

00545 Solids, settleable / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Five per Week

Limit	
Limit Unit Desc	Milliliters per Liter
Statistical Base	DAILY MX
Limit Value	1
DMR Values	
3/31/12	1.5
1/31/14	6

31648 E. coli, MTEC-MF / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
7/1/09	5/31/14	GRAB	Three per Week

Limit	
Limit Unit Desc	Number per 100 Milliliters
Statistical Base	DAILY MX
Limit Value	487
DMR Values	
11/30/13	601.5
1/31/14	509.9
12/31/15	870.4

